

**LAW OFFICES OF  
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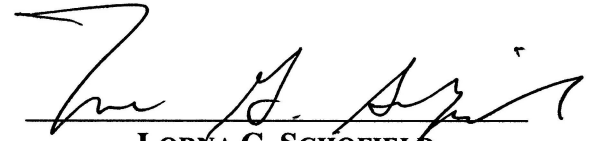
December 15, 2022

Honorable Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Application **DENIED** without prejudice to renewal. The Court ordinarily does not adjourn the initial conference pending the filing of an answer or settlement negotiations. The conference is telephonic, which should reduce any inconvenience to counsel, and if necessary, can be held after trial hours. If an adjournment is sought, counsel shall detail their conflict (the reason for the conflict and the hours they are conflicted) on January 25, 2023, and every day thereafter when they claim to be unavailable until the week of February 27, 2023.

Dated: December 19, 2022  
New York, New York

Re: Obreight Ingram v. International Asbestos Removal, Inc., et al  
1:22-cv-10149 (LGS)  
Request for Adjournment

  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

Dear Judge Schofield:

I am counsel for the plaintiff in the above referenced matter. I am in receipt of your order issued December 9 2022, and attach a copy of my correspondence with Defendants' attorney, Saul Zabell, advising him of the order and the parties' obligations. Pursuant to Rule I.B.2 of the court's Individual Rules, I am writing to seek an adjournment of the scheduled January 25, 2023 Initial Conference.

I have communicated with Mr. Zabell's office regarding the need to adjourn the January 25, 2023 conference due to my being out of town. Based on our mutual schedules, it appears that all parties' counsel are available any time during the week of February 27, 2023 for an adjourned date (or later as suits the court).

Further, as I just received the Rule 4(d) waiver of service yesterday, making Defendants' answer not due until February 14, 2023, the parties have not yet engaged in any settlement discussions either. Consequently, we would ask that your Honor also move the due date for the provision of a Proposed Civil Case Management Plan, and joint letter to the court to the week before the newly adjourned IPTC, whenever that might be.

No prior requests have been made for this adjournment, and as stated above, opposing counsel is in agreement with the request.

Thank you for your consideration. If you need anything further, please let me know.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Barbara Meister Cummins', written over a horizontal line.

Barbara Meister Cummins  
Counsel for Plaintiff, Obreight Ingram

Cc: Saul Zabell, Esq.

attachment